



January 28th, 2019

CITY OF DALLAS

Michael J. Wilhelm
Chief, Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: City of Dallas Wireless Emergency Alert Test-PS Docket No. 15-91

Dear Chief Wilhelm:

The City of Dallas would like to request an FCC Rule Waiver on behalf of Participating Commercial Mobile Services (CMS) Providers to conduct a live Wireless Emergency Alert (WEA) City of Dallas test.¹ The City would like to use the VESTA Alert Notification System on March 4th, 2019, and if necessary, a back-up date of March 8th, 2019 at 10:00AM (CT).

The live test, pending your approval, is scheduled to occur between 10:00AM-10:30AM and will involve the use of the Integrated Public Alert and Warning System (IPAWS) WEA dissemination method. The target area polygon will cover the Central Business District in the City of Dallas. The Central Business District polygon includes cell towers for all major cellular networks and should give us enough message recipients to conduct a survey following the test to gauge delivery success.

The test message will read: *"This is a test of City of Dallas Wireless Emergency Alerts. No Action is required."*

The test is not intended to be a substitute for other scheduled tests of Wireless Emergency Alerts. This will be the first live test of WEA for the City of Dallas and will build upon the country's live IPAWS test conducted by FEMA on October 3rd, 2018. The City of Dallas has also conducted a successful test in the IPAWS Lab and plans to conduct an additional IPAWS Lab test before March 4th.

As emergency managers, we are tasked with public information and warning, which includes alerts and notifications to our residents and local, state, and federal officials during emergencies and incidents that impact life, safety, and property. The City of Dallas faces a wide variety of hazards that could impact our residents and guests. The purpose of this test is to ensure that the WEA system will work during such emergencies and the accuracy in sending an WEA to a localized area within the city. Additionally, as recent events in Hawaii and California demonstrate, it is essential that the public be familiar with WEA, and that emergency managers be proficient in the use of WEA before the initiation of an actual alert is necessary. Accordingly, the City of Dallas believes that it is imperative to test the system now, rather than wait until May 2019 for the FCC's end-to-end testing rules to become effective.

In addition, the City of Dallas is currently working on a multi-media public announcement and marketing plan for the proposed upcoming City of Dallas WEA test to ensure public

¹ A Participating CMS Provider is an FCC licensee providing commercial mobile service as defined in section 332(D)(1) of the Communications Act of 1934 that has voluntarily elected to transmit WEA Alert Messagers under part 10 of the FCC's rules. See 47 CFR §10.10 (d), (f)



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understanding of the function and utility of WEA, and that the March 4th WEA message is in fact a test. This plan will be shared with the Public Information Officers in all surrounding jurisdictions for distribution to all Dallas-Fort Worth media outlets, including daily newspapers and radio and television outlets, and will be posted on social media. The City of Dallas has also coordinated information about the test with the Participating CMS providers that operate within the City of Dallas, as well as with all emergency authorities that operate within the City of Dallas and surrounding jurisdictions, including first responder organizations such as police and fire agencies and 911 public safety answering points (PSAPs), to ensure that they are aware of the test and can confirm to the public that the WEA message is a test. The City of Dallas has already taken the first step in a region-wide briefing to our emergency management partners on October 11th, 2018. A secondary briefing is scheduled to occur on February 11th, 2019.

The City of Dallas anticipates that due to the density of bordering jurisdictions to the City, members of the public from outside the alert polygon may receive the test WEA from the City of Dallas. This has been addressed accordingly in our outreach materials.

The City of Dallas Office of Emergency Management (OEM) plan to record test results and provide a detailed account of any problems that occur in the distribution of the WEA test to your office.

If you have any questions or need further information, please contact Kevin Oden, Assistant Emergency Management Coordinator, City of Dallas Office of Emergency Management at kevin.oden@dallascityhall.com or (214) 670-4276.

I appreciate your consideration in this matter.

Sincerely,

Rocky Vaz
Managing Director, City of Dallas
Office of Emergency Management